



September 15, 2006

Lynn Fabrizio, Staff Attorney/Hearings Examiner
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

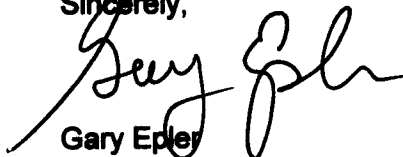
Re: Investigation into Utility Poles
Unitil Energy Systems, Inc. Response to Data Requests
DM 05-172

Dear Lynn:

On behalf of Unitil Energy Systems, Inc. ("Unitil"), enclosed please find an original and four (4) copies of the Company's responses to Commission Staff's follow-up to the Fifth Set of Document and Information Requests, including responses to Request Nos. Staff, 5-1A, 5-7B, 5-8B, 5-8C, 5-8E, 5-8F, 5-8H and 5-21A. An electronic copy of this filing is being e-mailed to all parties.

Thank you for your attention to this matter.

Sincerely,



Gary Epler

Enclosure

cc: Service List (by e-mail)

Gary Epler
Senior Counsel

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New Hampshire Public Utilities Commission
Generic Investigation Into Utility Poles
Docket No. DM 05-172
Commission Staff's Fifth Set of Data Requests (Topic Four Follow ups)
Responses of Unitil Energy Systems, Inc.

Request No. Staff 5-1A:

Electrics & VZ – Please review the following scenarios of joint pole line extensions and supply the dollar figures for the pole and anchor work (only) based on your particular billing schedules. Please explain any design assumptions and additional related costs in fleshing out the examples. VZ, please supply a separate response for each of the three Electric companies, based on your agreements with those companies.

Scenario 1:

- three pole line extension on private property
- **Electric** maintenance area
- (3) 140' spans / 35' poles
- **Anchor at pole 3 placed for electric use only**

	Pole 1	Pole 2	Pole 3 + anchor	Total
Electric billing to VZ	Note 1	Note 1	Note 1	
Electric invoice to the customer	Note 2	Note 2	Note 2	
VZ invoice to customer	Note 3	Note 3	Note 3	
Total cost to customer				

Note 1: If Electric billing to VZ is affected by the customer contribution, please explain.

Note 2: If the amount Electric invoices the customer is affected by Electric billing to VZ, please explain.

Note 3: If the amount VZ invoices the customer is affected by Electric billing to VZ, please explain.

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Scenario 2:

- three pole line extension on private property
- **Electric** maintenance area
- (3) 140' spans / 35' poles
- Anchor at pole 3 **required by both owners**

	Pole 1	Pole 2	Pole 3 + anchor	Total
Electric billing to VZ	Note 1	Note 1	Note 1	
Electric invoice to the customer	Note 2	Note 2	Note 2	
VZ invoice to customer	Note 3	Note 3	Note 3	
Total cost to customer				

Note 1: If Electric billing to VZ is affected by the customer contribution, please explain.

Note 2: If the amount Electric invoices the customer is affected by Electric billing to VZ, please explain.

Note 3: If the amount VZ invoices the customer is affected by Electric billing to VZ, please explain.

Scenario 3:

- three pole line extension on private property
- **VZ** maintenance area
- (3) 140' spans / 35' poles
- Anchoring at pole 3 **placed for electric but not required by VZ**

	Pole 1	Pole 2	Pole 3 + anchor	Total
VZ billing to Electric	Note 1	Note 1	Note 1	
VZ invoice to customer	Note 2	Note 2	Note 2	
Electric invoice to customer	Note 3	Note 3	Note 3	
Total cost to customer				

Note 1: If VZ billing to Electric is affected by the customer contribution, please explain.

Note 2: If the amount VZ invoices the customer is affected by VZ billing to Electric, please explain.

Note 3: If the amount Electric invoices the customer is affected by VZ billing to Electric, please explain.

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Scenario 4:

- three pole line extension on private property
- VZ maintenance area
- (3) 140' spans / 35' poles
- Anchoring at pole 3 **required by both owners**

	Pole 1	Pole 2	Pole 3 + anchor	Total
VZ billing to Electric	Note 1	Note 1	Note 1	
VZ invoice to customer	Note 2	Note 2	Note 2	
Electric invoice to customer	Note 3	Note 3	Note 3	
Total cost to customer				

Note 1: If VZ billing to Electric is affected by the customer contribution, please explain.

Note 2: If the amount VZ invoices the customer is affected by VZ billing to Electric, please explain.

Note 3: If the amount Electric invoices the customer is affected by VZ billing to Electric, please explain.

Response: See attached.

Person Responsible: Scott D. Wade, Dale Nudd

Date: September 15, 2006

DM 05-172, Topic 4, Round 5**Retail Customer Relationships - Follow ups from 7/26/06 tech session.****5-1A)****Scenario 1:**

three pole line extension on private property

Electric maintenance area

(3) 140' spans / 35' poles

Anchor at pole 3 placed for electric use only

	Pole 1	Pole 2	Pole 3 + anchor	Total
Electric billing to VZ	Note 1 \$575.00	Note 1 \$575.00	Note 1 \$575.00	\$1,725.00
Electric invoice to the customer	Note 2 \$0	Note 2 \$1,532.25 (\$575.00)	Note 2 \$2,018.92 (\$575.00)	\$2,401.17
VZ invoice to customer	Note 3	Note 3	Note 3	
Total cost to customer				

Note 1: If Electric billing to VZ is affected by the customer contribution, please explain.**Note 2:** If the amount Electric invoices the customer is affected by Electric billing to VZ, please explain.**Response:** The customers contribution is reduced by the amount we will receive from VZ for the poles.**Note 3:** If the amount VZ invoices the customer is affected by Electric billing to VZ, please explain.**Scenario 2:**

three pole line extension on private property

Electric maintenance area

(3) 140' spans / 35' poles

Anchor at pole 3 required by both owners

	Pole 1	Pole 2	Pole 3 + anchor	Total
Electric billing to VZ	Note 1 \$575.00	Note 1 \$575.00	Note 1 \$575.00	\$1,725.00
Electric invoice to the customer	Note 2 \$0	Note 2 \$1,532.25 (\$575.00)	Note 2 \$2,018.92 (\$575.00)	\$2,401.17
VZ invoice to customer	Note 3	Note 3	Note 3	
Total cost to customer				

Note 1: If Electric billing to VZ is affected by the customer contribution, please explain.**Note 2:** If the amount Electric invoices the customer is affected by Electric billing to VZ, please explain.**Response:** The customers contribution is reduced by the amount we will receive from VZ for the poles.**Note 3:** If the amount VZ invoices the customer is affected by Electric billing to VZ, please explain.

Scenario 3:

three pole line extension on private property

VZ maintenance area

(3) 140' spans / 35' poles

Anchor at pole 3 **placed for electric but not required by VZ**

	Pole 1	Pole 2	Pole 3 + anchor	Total
VZ billing to Electric	Note 1 \$575.00	Note 1 \$575.00	Note 1 \$805.00	\$1,955.00
VZ invoice to the customer	Note 2	Note 2	Note 2	
Electric invoice to customer	Note 3 \$0	Note 3 \$817.35	Note 3 \$1,297.02	\$2,114.37
Total cost to customer				

Note 1: If Electric billing to VZ is affected by the customer contribution, please explain.Note 2: If the amount Electric invoices the customer is affected by Electric billing to VZ, please explain.**Response:** The customers contribution for poles is what we will pay VZ for the poles.Note 3: If the amount VZ invoices the customer is affected by Electric billing to VZ, please explain.**Scenario 4:**

three pole line extension on private property

VZ maintenance area

(3) 140' spans / 35' poles

Anchor at pole 3 **required by both owners**

	Pole 1	Pole 2	Pole 3 + anchor	Total
VZ billing to Electric	Note 1 \$575.00	Note 1 \$575.00	Note 1 \$575.00	\$1,725.00
VZ invoice to the customer	Note 2	Note 2	Note 2	
Electric invoice to customer	Note 3 \$0	Note 3 \$817.35	Note 3 \$1,297.02	\$2,114.37
Total cost to customer				

Note 1: If Electric billing to VZ is affected by the customer contribution, please explain.Note 2: If the amount Electric invoices the customer is affected by Electric billing to VZ, please explain.**Response:** The customers contribution for poles is what we will pay VZ for the poles.Note 3: If the amount VZ invoices the customer is affected by Electric billing to VZ, please explain.

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Request No. Staff 5-7B:

Electrics - At the technical session, some concern was expressed that builders, in an effort to expedite construction work schedules, will "shop around" for the joint owner most likely to act quickly. What do you do to prevent builders from manipulating the system by telling your company that they don't want VZ service in VZ maintenance areas and forcing you to set poles to honor service requests outside of your maintenance areas?

Response:

Unitil does not attempt to either prevent or encourage builders manipulate the system. The choice of a telecommunications service provider is for the customer to make.

Person Responsible: Scott D. Wade, Dale Nudd **Date:** September 15, 2006

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Request No. Staff 5-8B:

Electrics & VZ –When a customer makes an application for service to either of the joint owners and pole work appears to be necessary, please identify what you believe would be the most effective written communication method for use between the respective line designers to document the contact and to ensure that both designers have enough information early in the application process to schedule their work? The EON/605A is recognized by the various IOPs as the form used to document the design of joint pole work. Would that be useful as an initial communication tool?

Response:

Currently, the most effective and efficient means of written communication in Unitil's business processes is by way of electronic exchanges. Therefore, it is Unitil's belief that providing the joint owner an email with applicable information attached from our work management data base is most effective. The EON/605A would not be a practical document to utilize in the initial communication process because: 1) The EON/605A is primarily used as a billing mechanism; and 2) The final design often changes from the initial stages of the job which would then require duplicative EON's/605A's

Person Responsible: Scott D. Wade, Dale Nudd **Date:** September 15, 2006

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Request No. Staff 5-8C:

Electrics & VZ – Given the paradigm shift in the joint pole ownership relationships that has been caused by the uncertainty that VZ will have a business relationship with a customer and therefore a reason to invest in a pole line extension for that customer, have the utilities attempted to change their JOA/IOPs to reflect that shift? If so, when and with what results?

Response:

Unitil has not specifically attempted to change the JOA/IOP. However, Unitil has had several meetings with senior managers at Verizon in an attempt to resolve various operational issues. These meetings are discussed in Staff 3-25.

In addition, Unitil believes that the IOP provides a partial remedy for the scenario presented. IOP #2 (1)(D) provides Unitil the ability to address the some of the concerns raised with customer issues.

Person Responsible: Scott D. Wade

Date: September 15, 2006

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Request No. Staff 5-8E:

Unitil – Please supply an expanded narrative of the suggestion you made to divide the joint pole work in a region by the type of work required (e.g. service poles by the electric company and the certain rebuilds/other work by VZ).

Response:

This particular suggestion is intended to enhance the satisfaction level of our customers requesting services or a change of service and to ensure timely scheduling of pole work necessitated by meeting electrical load demands and other electrical criteria (voltage levels, power factor, etc.) It raises a similar concern previously noted in emergency responses whereby customers in certain towns may not necessarily receive the same level of service that customers receive from other towns, which is dependent upon maintenance areas. The suggestion to divide the joint pole work by the type of work may not necessarily result in an equivalent balance of work, but may be a method to improve overall service to consumers.

Person Responsible: Scott D. Wade, Dale Nudd

Date: September 15. 2006

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Request No. Staff 5-8F:

Electrics & VZ – Please discuss the options you employ (or might institute) to proactively communicate with customers and others, including joint owners, when scheduled work cannot be started/finished in a scheduled period for any reason and must be rescheduled/pushed out.

Response:

Unitil proactively communicates with its customers and others, normally by telephone or email. Scheduled jobs and activities are reviewed on a weekly basis and proactive phone calls are made based on these planning sessions. If a specific day is committed to (appointment) and for some reason is not met, Unitil notifies (normally via phone) the customer and others within one (1) business day as to the causes of the delay.

Person Responsible: Scott D. Wade, Dale Nudd **Date:** September 15, 2006

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Request No. Staff 5-8H:

Electrics & VZ - What is your company policy or practice regarding on-site communications between your company's technicians and builders/owners/customers? Do you encourage your technicians to make an attempt to keep the customer informed when problems arise, when an emergency requires that they pull off the job, or about the general progress of the job?

Response:

Under certain circumstances, Unitil's technicians (Lineworkers) will communicate directly with a builder/owner/customer in the event that these circumstances arise. Generally speaking, this practice is dictated by the type and status of work that is in progress, the degree to which the builder/owner/customer is involved or needs to be involved, the effects on the customer's equipment, and previous conversations with the builder/owner/customer. Unitil's lineworkers are generally encouraged to keep customers informed when practical and applicable.

Person Responsible: Scott D. Wade, Dale Nudd **Date:** September 15, 2006

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Request No. Staff 5-21A:

Electrics & VZ - Please detail your respective company positions on the interpretation and use of IOP#2 1.D (1) & (2).

Response:

As discussed during the technical session, Unitil has interpreted this section as allowing the non-Maintaining Company to place and remove a joint pole or poles where the Maintaining Company is unable to complete the pole work in time to meet a reasonable service date, and a mutual agreement (as provided in IOP #2 (1)(D)(1) cannot be reached, and the non-Maintaining Company's action is necessary to fulfill customer needs on time.

Person Responsible: Scott D. Wade

Date: September 15, 2006